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## REVIEW WAIVER PER CLASSIFICATION OFF IN REPLY TO REF ACTION ITEM STATUS O OPEN 18 CLOSED O PARTIAL LTR APPROVALS:

EG¤G ROCKY FLATS

EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 (303) 966-7000

October 15, 1993

93-RF-12592

James K. Hartman Assistant Manager Transition and Environmental Restoration DOE, RFO

COMPREHENSIVE RISK ASSESSMENT IMPACTS (10561) - NMH-533-93

The referenced letter asks for an assessment of the scope, schedule and budget impacts of the Comprehensive Risk Assessment (CRA) on Operable Unit (OU) work packages. The following assessment was made in light of both Department of Energy's (DOE) and Systematic Management Service's positions outlined in the reference.

The CRA should be developed concurrently with the Feasibility Study (FS) as recommended by the CRA forum. This interface would allow the assessment of both OU risks and site-wide risks for all remediation alternatives at an OU. The most appropriate remediation alternative could then be chosen based on human health risks.

In order to have a CRA though, there must be more than one OU to assess. This is because the cumulative risk from one OU would just be the OU risk itself. Therefore, the results of a CRA would only be needed when there are at least two OUs to assess. Also, since the CRA scoping document splits the Rocky Flats Plant into the Walnut Creek drainage and the Woman Creek drainage, it would be appropriate to start separate CRA risk assessments in each drainage. It would also be appropriate for OU 6, "Walnut Creek," and OU 5, "Woman Creek," to be included in the first set of CRA results for each drainage since these OUs accept contaminants from all other OUs. Therefore, the CRA should be started in each drainage when there are at least two FS Reports started for each drainage, and OU 5 and OU 6 are included.

The start of the FS Report preparation for the seven OUs are outlined below. OUs 4 and 7 are Resource Conservation and Recovery Act (RCRA) units and are currently developing Interim Measure\Interim Remedial Action (IM/IRA) Decision Documents. The schedule for the start of a comprehensive FS Report at OUs 4 and 7 is currently being developed and is expected to be after May 1995.

Ctart Especiality Charly Doport

AUTHORIZED CLASSIFIER	Operable Unit	Start Feasibility Study Report
SIGNATURE	OU 1	July 1994
DOCUMENT CLASSIFICATION	OU 2	May 1995
REVIEW WAIVER PER	OU 3	May 1995
CHASSIFICATION OFFICE	OU 4	November 1993 (IM/IRA Decision Document)
IN REPLY TO REP CC NO:	OU 5	October 1995
1212-RF93	OU 6	May 1995
ACTION TEN STATUS	OU 7	March 1994 (IM/IRA Decision Document)

James K. Hartman October 15,1993 93-RF-12592 Page 2

In the Walnut Creek drainage, OU 2 and OU 6 will be the first OUs to start the FS Report. Since all the criteria for starting the CRA are present, the CRA should proceed with a formal quantitative analysis in May 1995.

In the Woman Creek drainage, OU 1 and OU 2 will be the first OUs to start the FS Report. Since OU 5 must also be included for the Woman Creek drainage, the CRA should proceed with a formal quantitative analysis in October 1995.

Given that the CRA results are not needed for approximately two years, there is no immediate cost or schedule impact due to the CRA. There will be DOE cost impacts in Fiscal Year 1995 (FY '95) though due to ramping up of the CRA to meet FS Report requirements. DOE costs will be incurred in FY '95 since the CRA is being developed by an outside contractor. EG&G Rocky Flats, Inc. will add \$50K to its FS Report preparation costs in the OU work packages to incorporate the CRA findings into the report. If the CRA findings affect remediation alternative selection, there will be supplemental budget and schedule requested for FS Report rework.

If you have any questions, please contact me or D. M. Smith of Environmental Science and Engineering at extension 8636.

N. M. Hutchins

Acting Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc.

RSR:mp

Orig. and 1 cc - J. K. Hartman

cc:

A. H. Pauole - DOE, RF0

R. J. Schassburger

B. K. Thatcher